Response to EPA proposed draft.

1. The definition excludes "on site labor intervention" yet the low power mode requires settings "adjustable on site". This is a conflict and allows for changes in the field. If the machines are alterable in the field to achieve a standard as opposed to improving over the standard, there will be great difficulty in determining compliance. The ultimate consumer or facility can be told the machine is programmed to meet specs but in fact they will be in no position to know that for sure.
2. Based on our tests in the field (and recognizing that the chamber ASHRAE test is more rigorous) the formula does not appear to put a very high bar on Energy Star status.
    a. A typical 400 can machine in the field, based on 127 total samples, uses an average of 8.208 kWh/day. The test would require 6.743 or approximately an 18% reduction from field tests.
    b. A typical 600 can machine in the field, based on 127 total samples, uses an average of 8.688 kWh/day. The test would require 7.733 or approximately an 11% reduction from field tests.
    c. A typical 800 can machine in the field, based on 127 total samples, uses an average of 10.464 kWh/day. The test would require 8.723 or approximately a 17% reduction from field tests.

    Delamping machines will produce this savings and possibly T-8 lights. The unknown factor is lack of data from ASHRAE conditions to see what the spread is between the test standard and the ASHRAE consumption measurement.

    We suggest that the test be ASHRAE chamber but the temperature be room temperature, i.e. 72-75. That way a more realistic and easier determination can be made by those involved.

3. The formula should be written as $Y=0.55(8.66 + (0.009 \times C))$. Otherwise you get the wrong answer.
4. Low power mode is still troublesome in what it is, how is it achieved and what constitutes field programmable controls. Is unplugging a field control?
5. Our data shows that the 400-800 can consumption is not lineal. Therefore the equation will be to favorable to the 600 can even if the ASHRAE test results in a higher kWh/day. You may need a more complicated formula to deal with that.

We would suggest much more test data to see if the formula achieves its intended result.

Marc Geman
President
Bayview Technology Group LLC